

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

NOAH CARL,

Plaintiff,

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No. 1:25-cv-343

v.

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RATIONALWIKI FOUNDATION, INC.
d/b/a RATIONALMEDIA FOUNDATION,
TRENT TOULOUSE, LARRY WILL,
and JOHN DOES 1-2,
Defendants.

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JURY DEMANDED

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COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, NOAH CARL, DPhil., by and through undersigned Counsel, Aaron T. Cress, Esq. (LATE NIGHT LAW, LLC), and hereby respectfully complains and shows as follows.

PARTIES, JURISDICTION & VENUE

1. Plaintiff Noah Carl, DPhil., is a citizen of the United Kingdom.
2. Defendant RationalWiki Foundation, Inc. d/b/a RationalMedia Foundation, is a New Mexico domestic nonprofit corporation and 501(c)(3), EIN 27-3197280, with its principal place of business located in New Mexico, at 122 Girard Ave NE Albuquerque, NM 87106.
3. Defendant Trent Toulouse is a resident of Albuquerque, New Mexico and was at all times relevant an officer and a Board Trustee of Defendant RationalWiki Foundation, Inc.
4. Defendant Larry Will is a resident of Maryland and is a Board Trustee of Defendant RationalWiki Foundation, Inc., who goes by the online pseudonym “Cosmikdebris.”

5. Defendant John Doe 1 is a resident of Kansas and a Board Trustee of Defendant RationalWiki Foundation, Inc., whose identity is unknown to Plaintiff upon reasonable investigation, and who goes by the online pseudonym “DuceMoosolini.”

6. Defendant John Doe 2 is a U.S. citizen, and an editor of a website published by Defendant RationalWiki Foundation, Inc., whose identity is unknown to Plaintiff upon reasonable investigation, and who goes by the online pseudonym “Plutocow.”

7. The Court has personal jurisdiction over the Defendants by virtue of their continuous and systematic business contacts with New Mexico, and because the Defendants’ acts and omissions alleged herein were committed in New Mexico.

8. Plaintiff invokes the Court’s subject matter jurisdiction pursuant to 28 U.S.C. § 1332, because the matter in controversy exceeds the sum or value of \$75,000, exclusive of costs and interest, and because no Defendant is a resident of the same state as the Plaintiff.

9. Venue is proper before the Court.

GENERAL ALLEGATIONS

I. RATIONALWIKI FOUNDATION, INC. IS AN INFORMATION CONTENT PROVIDER

10. Under 47 U.S.C. § 230, an “interactive computer service” is afforded certain protections from civil liability. However, Section 230 distinguishes between an “interactive computer service,” and an “information content provider,” which does not enjoy such protections.

11. Section 230 defines an “interactive computer service” as “any information service, system, or access software provider that provides or enables computer access by multiple users to a computer server...” 47 U.S.C. 230(f)(2).

12. Section 230 defines an “information content provider” as “any person or entity that is responsible, in whole or in part, for the creation or development of information provided through the internet or any other interactive computer service.” 47 U.S.C. 230(f)(3).

13. Defendant RationalWiki Foundation, Inc. (“RWF”) is an information content provider.

14. RWF publishes, maintains and operates a website, at <https://rationalwiki.org> (the website, hereinafter referred to as, “RationalWiki”).

15. RWF was incorporated in 2011 by Defendant Trent Toulouse, a resident of New Mexico.

16. Since 2011, Toulouse has served continuously as both a Board Trustee, and Operations Manager, of RWF.

17. The Operations Manager within RWF functions as an executive officer.

18. As Operations Manager, Toulouse has the sole ability to alter settings and create functions and extensions on the website server.

19. The website server is, and at all times relevant was, located in New Mexico.

20. The website server is, and at all times relevant was, operated from New Mexico.

21. Toulouse has operated and managed RationalWiki—the website—from New Mexico continuously, since at least 2011, until the present.

22. New Mexico is the principal geographic locus of RWF’s and RationalWiki’s operations.

23. RWF is governed by a Board of Trustees. Other than Toulouse, and an individual named David Gerard, all past and current Trustees use pseudonyms on RationalWiki.

24. Since 2011, only twenty-seven individuals have ever served as Trustees of RWF.

25. RationalWiki has over 8,000 discrete articles and millions of unique monthly visitors.

26. RationalWiki’s “Community Standards” page was created and heavily edited by Defendant Toulouse, and has been edited by Defendants Will and Doe within the last three years.

27. The page states, *inter alia*, that: (i) RationalWiki articles should take a “snarky” (meaning, snide or derisive) tone; that (ii) RationalWiki has a “scientific point of view,” meaning that “our articles take the side of the scientific consensus on an issue”; and that (iii) all content on RationalWiki must conform to the “RationalWiki Mission.”

28. The “RationalWiki Mission” page, in turn, states, *inter alia*, that:

The RationalWiki Mission is:

1. Analyzing and refuting pseudoscience and the anti-science movement;
2. Documenting the full range of crank ideas;
3. Explorations of authoritarianism and fundamentalism.
4. Analysis and criticism of how these subjects are handled in the media.

We also have a fifth, unofficial purpose, which is to provide people who agree with the previously-stated goals a place to just hang out and have fun with like-minded people.

RationalWiki is not a general encyclopedia; it does not require articles on every known subject. However, the wiki's mainspace welcomes many articles that do not relate to the primary missions of RationalWiki providing that they are factually accurate and of interest to the community at large. These include articles on general science, historical events and important individuals throughout the world.

29. Various other policy pages on RationalWiki explicate and clarify this viewpoint further.

For example, each of the six underlined words in the above-quoted portion of the RationalWiki Mission denotes a hyperlink, which opens a separate page containing an article on that topic, i.e., on “pseudoscience,” “authoritarianism,” etc. These articles further define what is meant by those terms as they are used in the RationalWiki Mission statement and throughout RationalWiki.

30. RationalWiki holds its content out as scientifically authoritative, and objective truth.

31. For example, a fundraiser banner that has appeared at the top of every page on RationalWiki since late 2024 reads, in part,

Fighting pseudoscience isn't free... We are... hundreds of volunteers who document pseudoscience and crankery around the world every day... [W]e believe we play an important role in defending truth and objectivity.

32. This banner links to a “Fundraiser” page that was created by Defendant Toulouse and has been edited within the last year by Defendant Will, and that contains the same statements.

33. RationalWiki claims that anyone with access to the internet can “edit” (i.e., alter or contribute to the content of) the website, by authoring or editing the articles that appear there, in the nature of an interactive computer platform as defined under 47 U.S.C. § 230(f)(2).

34. This is not true in practice.

35. A very particular, highly ideologized, and readily identifiable left-liberal view of what is rational, what constitutes legitimate science, and what constitutes scientific consensus, pervades all of RationalWiki’s articles, with virtually no variation.

36. Editors’ contributions that contravene this viewpoint, or the RationalWiki Mission, are quickly removed from RationalWiki by a core of specialized editors, which includes Defendants Toulouse, Will, and Doe.

37. This core of specialized editors actively, regularly, and aggressively enforces RationalWiki’s Mission and viewpoint. Articles that are not “on mission” are deleted or altered, edits that are not “on mission” are quickly reverted, and editors who do not uphold the Mission are blocked from contributing.

38. This core of specialized editors includes sysops, techs, and moderators. Most editors (including techs, moderators and sysops) are anonymous, and use pseudonyms on the website.

39. Of these specialized editors, sysops are the lowest-ranking. There are approximately 1500 pseudonymous usernames listed as sysops on RationalWiki, though the true number of active individual sysops is lower than 200 individuals.

40. A page on RationalWiki titled, “Sysop guide” sets forth requirements that sysops must follow, including, “Checking edits by unknown contributors for untruth,” and “to collaborate

with others to further RationalWiki's mission.” The underlined term denotes a hyperlink to the “RationalWiki Mission” page.

41. Techs, moderators, and sysops have authority to alter, block and censor content created by rank-and-file editors, in order to enforce the “Mission.”

42. Techs and moderators have more extensive authority to block and censor than sysops and other editors do.

43. Techs and moderators are the highest-ranking editors of RationalWiki. There are only fifteen techs, seven of whom, including Defendants Will and Toulouse, are current and/or past RWF Board Trustees. (Defendant Doe 2 is also a tech.) There are only six moderators, three of whom, including Defendant Doe, are current and/or past RWF Board Trustees.

44. Extensive canvassing of the articles on RationalWiki reveals that virtually all of the articles appearing there have been edited by one or more techs, one or more moderators, and one or more past or current Board Trustees; and that Defendants Toulouse, Will, Hughes and Doe, have each edited thousands of articles and regularly confer, in various open chat pages, about what content to publish, alter, or censor.

45. RationalWiki’s Mission and viewpoint of what constitutes legitimate science are so extremist and dogmatic that, e.g., an article on the website, about the world-renown (and thoroughly mainstream) physicist and popular author Michio Kaku describes Kaku as “a crank” who has “unorthodox views,” and compares Kaku to notorious conspiracy theorist David Icke (who has only a high school education and is famous for propounding his belief on social media that world leaders are “lizard people,” i.e., shape-shifting reptiles from another dimension.)

46. As another example of RationalWiki's extremist ideology, an article on the website about Steven Pinker (the world-renown linguist, popular author and senior professor of psychology at Harvard University) categorizes Pinker as a "racialism pseudoscientist."

47. No particular background, knowledge, training, or credential—academic, scientific, or otherwise—is required to be an editor, sysop, tech, moderator, or Trustee of RationalWiki. The only requirements to "edit" (i.e., to create or alter content) are to adhere to RationalWiki's Mission and uphold its point of view, to adhere to various non-ideological behavior rules and procedures for decision-making, and submit to oversight by higher ranking editors.

48. An article created by Toulouse in 2011, titled "Legal FAQ," has appeared on RationalWiki continuously since that time. It describes RationalWiki as a "content producer." This article was created by Toulouse and has been edited by Defendants Toulouse and Will.

49. Individuals who are the subject of laudatory articles on RationalWiki are those whose views conform to the RationalWiki point of view. However, consistent with RationalWiki's Mission of "refuting pseudoscience," most articles about individuals on RationalWiki are disparaging and accuse the subjects of being cranks, fascists and pseudoscientists.

50. When a disparaging article about an individual appears on RationalWiki, this suggests that the person who is the subject of the article is a crank, a fascist, a racist, "anti-science," or is a pseudoscientist.

II. DEFENDANTS ARE DEFAMING PLAINTIFF

51. Plaintiff Noah Carl is a sociologist who earned his DPhil (equivalent to a Ph.D.) from Oxford University. Dr. Carl has authored dozens of peer-reviewed scholarly publications, many

of them in Q1 academic journals.¹ He has an h-index of 18,² and his work has been cited over 1000 times by other researchers.

52. RationalWiki contains an article titled “Noah Carl.” The article was published on RationalWiki in 2018 and has remained published and viewable on the website since that time. It has been edited by multiple RWF Trustees and RationalWiki techs, moderators and sysops, including Defendants Will and Does 1-2.

53. The article is patently an attack piece, that was published to disparage Dr. Carl and damage his reputation on account of his views.

54. On August 22, 2022, Defendant Doe 2 placed the article under protected status to prevent non-disparaging edits from being made by third-parties.

55. The article portrays Dr. Carl as a “eugenicist,” a “racist,” a “pseudoscientist,” a “white supremacist,” and a “white nationalist.”

56. The article is false because Dr. Carl is none of those things.

57. As used by RationalWiki, those terms are not mere subjective epithets, because RationalWiki publishes specific definitions of what it means by these terms, and hyperlinks those definitions from the article about Dr. Carl.

a. The Article About Dr. Carl Uses Narrowly Defined Terminology

58. In the article about Dr. Carl, at the bottom of the page, a list of “categories” appears, which Dr. Carl purportedly belongs in. These categories include: “Racism,” “Eugenics supporters,” “Pseudoscience promoters,” “Racists,” “Racialism pseudoscientists,” and “White supremacists.”

¹ Q-score is an index of a scholarly journal’s impact, with Q1 being the top 25% of journals in their domain.

² h-index is a measure of a scientist’s personal impact in their field. An h-index of 20 after 20 years of publishing is considered excellent and makes a scientist competitive for tenure-track positions.

59. Each of the “categories” in this list is hyperlinked to another page on RationalWiki which lists individuals who purportedly belong in that category, including Dr. Carl.

60. At the top of the “Categories:Racism” page (which has been edited within the last three years by Defendant Doe 2, and where Dr. Carl is listed alongside “Hamas,” “Nazism” and “Adolf Hitler”), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Racism.*” The underlined word denotes a hyperlink which links to an article titled “Racism.” That article has been edited within the last three years by Defendants Will and Doe 2, and defines “racism,” as,

the belief that humans can be meaningfully defined into biological ethnic categories in order to separate supposed superior from inferior races and/or generally showing discrimination or hostility against a person(s) on the basis of their race.

61. By defining racism in this manner, and categorizing Dr. Carl under “Racism” alongside Adolf Hitler, Defendants state that their definition of “racism” applies to Dr. Carl.

62. That definition does not apply to Dr. Carl, who has never proposed that there are “superior [or] inferior races” and has never expressed support for “discrimination or hostility against a person[] on the basis of their race.”

63. On the contrary, Dr. Carl has stated (in a blog post that is specifically referenced and linked to in the RationalWiki article about him) that “racism is morally wrong.”

64. At the top of the “Categories:Racists” page (which has been edited by Defendants Does 1-2, and where Dr. Carl is listed alongside “Adolf Hitler” and “Anders Behring Breivik”), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Racism.*” The underlined word denotes a hyperlink which also links to the above-referenced article titled “Racism.”

65. The RationalWiki article about Dr. Carl states that, “In 2018, Carl published a paper defending race and intelligence research... The paper has been quoted by racists...” The article then cites that paper, in a footnote.

66. Though discussed misleadingly as an example of Dr. Carl’s supposed “racism,” the article in question was published in *Evolutionary Psychological Science*, a reputable journal published by Springer, the prestigious scientific publishing house.³

67. In that article, Dr. Carl denounces racism, stating,

equating particular scientific statements with racism is not merely logically fallacious, but potentially unethical too. The reason being that it may end up encouraging precisely the behaviour that it aims to forestall. Suppose for the sake of argument that, one day in the future, evidence for a genetic contribution to psychological differences between human populations becomes so overwhelming that it cannot be reasonably denied... If between now and then, anyone who claims that genes might contribute to psychological group differences is pilloried as a ‘racist,’ when the evidence eventually does become overwhelming, a much greater number of people are likely to take it as ‘scientific proof that racism was right all along.’

68. Thus, RationalWiki’s discussion of this article as an example of Dr. Carl’s supposed “racism” is deliberately misleading.

69. At the top of the “Categories:Eugenics supporters” page (which has been edited within the last three years by Defendant Doe 2, and where Dr. Carl is listed alongside “Adolf Hitler” and “Jeffrey Epstein”), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Eugenics.*” The underlined word denotes a hyperlink which links to an article titled “Eugenics.” That article has been edited within the last three years by Defendants Will and Doe 1, and defines “eugenics” by stating that,

Most eugenacists believe that the goal of humanity is to achieve racial purity and exterminate people they deem not racially pure [through] abortion, forced sterilization, and mass murder.

³ Carl, N. How Stifling Debate Around Race, Genes and IQ Can Do Harm. *Evolutionary Psychological Science* 4, 399–407 (2018). <https://doi.org/10.1007/s40806-018-0152-x>

70. By categorizing Dr. Carl as an “eugenics supporter” alongside Adolf Hitler and hyperlinking to the RationalWiki article about eugenics which gives this description, Defendants state that Dr. Carl is a “eugenics supporter” to whom that description (i.e., “believe[s] that the goal of humanity is to achieve racial purity and exterminate people,” etc.) applies.

71. That description does not apply to Dr. Carl, who has never stated nor given any indication that he believes that “the goal of humanity is to achieve racial purity and exterminate people [eugenicists] deem not racially pure [through] abortion, forced sterilization, and mass murder.”

72. On the “Categories:Pseudoscience promoters” page (which has been edited by Defendant Doe 2, and where Dr. Carl is listed alongside “Billy Graham,” “Adolf Hitler” and “L. Ron Hubbard”), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Pseudoscience.*” The underlined word denotes a hyperlink which links to an article titled “Pseudoscience.” That article has been edited within the last three years by Defendants Will and Doe 1, and defines “pseudoscience” as follows:

Pseudoscience describes any belief system or methodology which tries to gain legitimacy by wearing the trappings of science but fails to abide by the rigorous methodology and standards of evidence that are the marks of true science. Promoters of pseudoscience often adopt scientific vocabulary, describing conjectures as hypotheses, theories, or laws, providing “evidence” from observation and “expert” testimonies, or even developing what appear to be mathematical models of their ideas. However, in pseudoscience, there is no honest attempt to follow the scientific method, provide falsifiable predictions, or develop double-blind experiments. Although pseudoscience is designed to appear scientific, it lacks all of the substance of science.

73. By categorizing Dr. Carl as a “pseudoscience promoter” and hyperlinking to the RationalWiki article about pseudoscience which gives this definition, Defendants state that Dr. Carl is a “pseudoscience promoter” to whom that definition applies.

74. That definition does not apply to Dr. Carl.

75. Defendants have no basis for calling Dr. Carl a “pseudoscientist” or a “pseudoscientist promoter.”

76. Dr. Carl is a Doctor of Philosophy and a sociologist with an h-index of 18, and has authored dozens of peer-reviewed scholarly publications over more than a decade of publishing. His scholarly work has been cited over 1000 times by other researchers.

77. Defendants, on the other hand, have no known academic credentials or scientific bona fides, other than Defendant Will (who purports on LinkedIn to have earned a B.S. in computer science after seven years at the University of Maryland) and Defendant Toulouse (who teaches at a community college, is listed as a co-author of only five scholarly publications over his entire career, and whose work is of such low impact that he does not even have an h-index or a profile on ResearchGate or Google Scholar.)

78. At the top of the “Categories:White supremacists” page (which has been edited within the last three years by Defendant Doe 2, and where Dr. Carl is listed alongside “Adolf Hitler,” “David Duke” and “Charles Manson”), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, White supremacy.*” The underlined word denotes a hyperlink which links to an article titled “White supremacy.” That article has been edited within the last three years by Defendants Will and Does 1-2, and defines “white supremacy,” as,

an ideology claiming that white people are superior to other races, and are a ‘master race’... The movements of this ideology are racialist and fascist.

79. The underlined words in the above-quoted passage denote hyperlinks which link to other articles that further define those terms. One of these articles, titled “Fascism,” has been edited within the last three years by Defendants Will and Does 1-2, and defines “fascism” as,

a system of far-right authoritarianism and totalitarianism characterized by its obsession with the nation and often race, severe regimentation of society, and extreme levels of political violence aimed at purifying and expanding the state.

80. The underlined words in the above-quoted passage, in turn, denote further hyperlinks which link to other articles that further define those terms (“totalitarianism” and “authoritarianism”) with specificity.

81. By categorizing Dr. Carl as a “white supremacist” and alongside Adolf Hitler and David Duke, and hyperlinking to the RationalWiki articles about “white supremacy” and “fascism” which give these definitions, Defendants state that Dr. Carl is a “white supremacist” and a “fascist” to whom those definitions apply.

82. Those definitions do not apply to Dr. Carl, who has never “claim[ed] that white people are superior to other races, and are a master race,” and has never advocated for “authoritarianism,” or “totalitarianism,” nor for “extreme levels of political violence aimed at purifying and expanding the state.”

83. The RationalWiki article about Dr. Carl states that, “Noah Carl is a British far-right sociologist, eugenacist and employee of the white nationalist Human Diversity Foundation.”

84. The underlined words in the above-quoted passage denote hyperlinks which link to other articles that further define those terms, including an article titled “Far-right,” which has been edited within the last three years by Defendants Will and Doe 2, and which defines that term as,

a political label used to identify parties and movements based on fascist, racist and/or extremely reactionary ideologies [that] tend to... favor[] concepts such as slavery, segregation... or sometimes even genocide of groups perceived to be inferior...

85. By calling Dr. Carl “far-right,” and hyperlinking to their article of that title, Defendants state that this definition (of “far-right”) applies to Dr. Carl.

86. That definition does not apply to Dr. Carl, who has never supported “slavery, segregation or genocide.”

87. Elsewhere in the RationalWiki article about Dr. Carl, it states that “He associates himself with far-right extremists and white nationalists...”

88. The underlined word in the above-quoted passage denotes a hyperlink to an article titled “White nationalism,” which has been edited by Defendant Doe 2 and (within the last three years) by Defendant Will, and states that “white nationalists,”

seek to ensure the survival of (what they see as) the white race... usually in opposition to a supposed globalist threat or Zionist conspiracy... Holocaust denialism and sympathizing with Nazis is a common thread among ‘white nationalists.’

89. By stating that Dr. Carl “associates himself with far-right extremists and white nationalists...” and by hyperlinking to the “White nationalism” article, Defendants strongly imply that the above-quoted description (of “white nationalists”) applies to Dr. Carl.

90. That description does not apply to Dr. Carl, who has never said that he believes in a “Zionist conspiracy,” has never expressed sympathy for Nazism, and has never engaged in, or expressed support for, Holocaust denial.

91. The RationalWiki article about Dr. Carl also states that “Carl promotes misinformation about COVID-19 vaccines and climate change denial.”

92. That is untrue.

93. Dr. Carl has never “promot[ed] climate change denial.”

94. Dr. Carl has expressed support for vaccination against COVID-19.⁴

95. Dr. Carl’s views regarding COVID-19 are based on scientific evidence, and align with views expressed by respected epidemiologists such as Martin Kulldorff and Jay Bhattacharya.

⁴ See “Vaccinating the Elderly Saved Lives.” Carl, Noah. Jan. 6, 2023 *The Daily Skeptic*. Retrieved April 7, 2025. <https://dailyskeptic.org/2023/01/06/vaccinating-the-elderly-saved-lives/>

96. The RationalWiki article about Dr. Carl further states that, “Carl publishes racialist pseudoscience” and “co-authored an article... arguing for pseudoscientific race realism...”

97. These statements are false. Dr. Carl does not publish “pseudoscience” and any views he has expressed regarding race are based on scientific evidence.

98. The RationalWiki article about Dr. Carl states that,

Carl... wrote an Islamophobic paper...

[Sociologist Emil] Kirkegaard and Carl, who are both right-wing Islamophobes and, apparently, mutual masturbators, review each other’s pseudoscience papers that bash Muslims.

99. No citation is provided to this so-called “Islamophobic paper.”

100. The underlined words in these passages denote hyperlinks, one to an article titled “Islamophobia,” and the other to the above-quoted article on “pseudoscience,” again, falsely suggesting that the definition of “pseudoscience” in that article applies to Dr. Carl.

101. The RationalWiki article on “Islamophobia” defines that term as,

a term used to refer to discrimination or prejudice against the religion of Islam and the Muslim people...

102. That definition does not apply to any paper Dr. Carl has ever written. Dr. Carl has never written any “Islamophobic” paper that “bash[es] Muslims,” and no citation is provided by RationalWiki to substantiate that allegation.

103. All of Dr. Carl’s papers dealing with Islam or with Muslims are scientific in nature and do not “bash Muslims.”

104. Earlier versions of the RationalWiki article about Dr. Carl have stated, within the last three years, that he holds “pro-Putin views.”

105. That statement was patently false and unsubstantiated, and in fact to the extent Dr. Carl has commented publicly on Russia-Ukraine matters he has written that Putin’s invasion of Ukraine is “brutal and illegal.”

106. Earlier versions of the RationalWiki article about Dr. Carl have stated, within the last three years, that he holds “regularly writes Islamophobic screeds” and that he “published a bunch of Islamophobic papers.”

107. Those statements were patently false and unsubstantiated.

108. Earlier versions of the RationalWiki article about Dr. Carl have stated, within the last three years, that Dr. Carl “espouse[s] white identity politics.”

109. That statement was patently false and unsubstantiated.

III. PLAINTIFF IS BEING DAMAGED

110. The RationalWiki article about Dr. Carl has been published and viewable on RationalWiki continuously since September 2018.

111. In October 2018, Dr. Carl was appointed to a research fellowship at Cambridge University.

112. In November 2018, an email was sent to Cambridge University claiming that Dr. Carl is “a white supremacist / alt-right individual who holds unorthodox racialist, extreme racist and offensive eugenics views,” with a link to the RationalWiki article as evidence. A similar email was sent to Oxford University.

113. This led to protests and the circulation of a petition demanding Dr. Carl’s removal, which resulted in the termination of Dr. Carl’s fellowship.

114. Shortly thereafter, in December 2018, a now-deleted announcement was published on RationalWiki which stated, “Notable news: RationalWiki page on Noah Carl leads to 200

academics signing open letter” and acknowledged RationalWiki’s role in the petition demanding Dr. Carl’s removal.

115. As a result of the termination of Dr. Carl’s fellowship, which was caused by the RationalWiki article about him, Dr. Carl has been unable, and continues to be unable, to obtain work in his field.

116. Since approximately the time it was published, the article has ranked on the first page of Google search results for Dr. Carl’s name.

117. RationalWiki’s “page rank” on Google is abnormally high. As a result, when Defendants publish disparaging articles like the one about Dr. Carl, this is likely to cause considerable reputational damage to the subjects and targets of that content, and is likely to discourage third parties from dealing with the individuals targeted.

118. Defendants are aware this.

119. In an article on RationalWiki titled, “Wiki,” in a portion of the article that has been edited by a RWF Trustee within the last three months, that article states, “RationalWiki does have a few articles that appear in the top of Google’s search rankings.”

120. Another article on RationalWiki titled, “RationalWiki,” states that,

RW is a fairly popular site... [S]ince 2013, RW's Alexa rank has hovered between 15,000th and 25,000th most popular website on the entire Internet, which translates to *about* 4 million-ish unique monthly visitors.... Since RationalWiki's inception, we've been featured in articles, op-ed pieces, and news reports — either quoted verbatim or referenced outright as a source for the article's claims — by a slew of online and mainstream media outlets worldwide.

121. Because the RationalWiki article about Dr. Carl ranks on the first page of Google search results for his name, Dr. Carl’s colleagues and potential business associates see the article when they search his name on Google.

122. Due to RationalWiki's claims of scientific objectivity, its resemblance to Wikipedia, and its high rank in Google search results, the website appears authoritative, thus discouraging others from dealing with the targets of its disparaging articles.

123. Defendants are aware of this.

124. The article's high rank in Google search results, alone, is enough to raise reputational concerns serious enough to discourage others from dealing with Dr. Carl, simply to avoid being associated with the subject of the article, even if they disagree with it.

125. These factors, coupled with the website's characterization of Dr. Carl as an "eugenicist," a "racist," a "pseudoscientist," a "white supremacist," and a "white nationalist," (alongside highly particularized and deeply stigmatizing definitions of those terms that do not apply to Dr. Carl), are humiliating and stressful to Dr. Carl, and discourage others from dealing with him.

126. Dr. Carl continues to be deprived of business and professional opportunities as a result of the RationalWiki article and its prominence in Google search results, causing Dr. Carl ongoing financial damages as well as mental anguish and suffering.

ENUMERATED CAUSES OF ACTION

WHEREFORE the Plaintiff, NOAH CARL, DPhil., as a direct and proximate result of Defendants' misconduct, has been damaged, and hereby pleads the following causes of action against Defendants, whom he seeks to hold liable:

COUNT I **Defamation** **Against All Defendants**

127. Plaintiff incorporates by reference all preceding paragraphs.

128. Defendants published false statements of fact about Plaintiff to third parties.

129. Defendants published aforesaid false statements without privilege.

130. Aforesaid third parties understood the false statements to have defamatory meaning.

131. Defendants published the false statements while knowing they are false.

132. Defendants published the false statements with reckless disregard for the truth.

133. Defendants published the false statements negligently.

134. As a direct and proximate result of Defendants' defamation, the Plaintiff has suffered and continues to suffer pecuniary damages and reputational harm, humiliation, mental anguish and suffering, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney's fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT II
Invasion of Privacy: False Light
Against All Defendants

135. Plaintiff incorporates by reference all preceding paragraphs.

136. Defendants published false statements of fact about Plaintiff in public fora, attributing false characteristics to Plaintiff.

137. The characteristics which Defendants falsely attributed to Plaintiff are highly offensive to a reasonable person.

138. Defendants intentionally portrayed Plaintiff in a false light before the community.

139. Defendants recklessly portrayed Plaintiff in a false light before the community.

140. Defendants portrayed Plaintiff in a false light without privilege.

141. Defendants' false light invasion of privacy is wanton and willful.

142. As a result of Defendants' false light invasion of privacy, Plaintiff has suffered humiliation, mental anguish, and suffering.

143. As a direct and proximate result of Defendants' false light invasion of privacy, the Plaintiff has been damaged, and is entitled to compensatory damages, punitive damages, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT III
Conspiracy
Against All Defendants

144. Plaintiff incorporates by reference all preceding paragraphs.

145. Defendants intentionally agreed to defame Plaintiff and violate Plaintiff's privacy.

146. Defendants agreed to defame Plaintiff and violate Plaintiff's privacy with knowledge of unlawfulness.

147. One or more Defendants acted overtly in furtherance of aforesaid agreement to defame.

148. One or more Defendants acted overtly in furtherance of aforesaid agreement to invade privacy.

149. Defendants participated in the maintenance of a webpage dedicated to defaming Plaintiff, by publishing, editing, and monitoring content on the webpage.

150. As a direct and proximate result of Defendants' conspiracy, the Plaintiff has suffered and continues to suffer pecuniary damages and reputational harm, humiliation, mental anguish and suffering, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney's fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT IV
Prima Facie Tort
Against All Defendants

151. Plaintiff incorporates by reference all preceding paragraphs.

152. Defendants jointly and severally committed intentional acts directed at Plaintiff.

153. Defendants committed aforesaid acts with intent to injure the Plaintiff.

154. Defendants committed aforesaid acts without justification.

155. Aforesaid acts were wanton and willful.

156. Aforesaid intentional acts were otherwise lawful.

157. Plaintiff was damaged as a result of aforesaid acts.

158. As a direct and proximate result of Defendants' prima facie tort, the Plaintiff has been damaged and is entitled to compensatory damages, punitive damages, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

JURY DEMAND

Plaintiff demands a trial by jury of all issues so triable.

PRAYER FOR RELIEF

WHEREFORE the Plaintiff, NOAH CARL, DPhil., hereby respectfully prays the Court's relief, as follows:

- I. Compensatory damages in the amount to be proven at trial.
- II. Punitive damages.
- III. Pre- and post-judgment interest.
- IV. Attorney's fees and all costs of bringing this action.
- V. Such other and further relief as the Court deems just and equitable.

Respectfully Submitted,

LATE NIGHT LAW, LLC

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